

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CHRISTINA WILLIAMS and MICHAEL
STERMEL, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

RED STONE, INC., as successor in interest to
MACFARLANE GROUP, INC., MEDLEY
OPPORTUNITY FUND II, LP, MARK
CURRY, BRIAN MCGOWAN, VINCENT
NEY, and other JOHN DOE persons or entities,

Defendants.

No. 2:18-cv-02747-MSG

**DEFENDANTS BRIAN MCGOWAN'S AND VINCENT NEY'S
OPPOSITION TO PLAINTIFFS' MOTION FOR
JURISDICTIONAL DISCOVERY AND ARBITRATION-RELATED DISCOVERY**

Defendants Brian McGowan and Vincent Ney hereby oppose Plaintiffs' Motion for Leave to Take Jurisdictional Discovery and Arbitration-Related Discovery, ECF No. 89. In the interest of preserving judicial economy, and as expressly permitted by Fed. R. Civ. P. 10(c), McGowan and Ney adopt and incorporate by reference as if set forth in full herein, Defendant Mark Curry's Memorandum in Opposition to Plaintiffs' Motion for Leave to Take Jurisdictional Discovery and Arbitration-Related Discovery, ECF No. 92. The arguments advanced by Defendant Curry opposing Plaintiffs' opened-ended request for jurisdictional discovery and discovery related to arbitration agreements Plaintiffs' entered into are equally applicable to Defendants Ney and McGowan. Plaintiffs' Motion should be denied.

Dated: March 7, 2019

Respectfully submitted,

By: /s/ Richard L. Scheff
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